IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF ARKANSAS FAYETTEVILLE DIVISION

BRET BIELEMA. PLAINTIFF

VS.

THE RAZORBACK FOUNDATION, INC.

DEFENDANT

Case No. 5:20-cv-05104-PKH

THE RAZORBACK FOUNDATION, INC.

COUNTER-PLAINTIFF

VS.

BRET BIELEMA and NEIL CORNRICH

COUNTER- DEFENDANTS

JOINT MOTION OF ALL PARTIES TO ADJUST PRE-TRIAL DEADLINES

Through the parties' undersigned counsel, and for good cause, Plaintiff/Counter-Defendant Bret Bielema, Counter-Defendant Neil Cornrich, and Defendant Counter-Plaintiff The Razorback Foundation, Inc., (collectively "Movants") request that the Court make the following adjustments to the pre-trial deadlines set forth in the Final Scheduling Order, as amended by the Court's "Text Only Order" dated January 11, 2021:1

- 1. Extension of Expert Disclosure Deadline until February 15, 2021
- 2. Extension of Fact Discovery Cut Off until March 1, 2021 (current deadline but narrowed to fact discovery only)
- 3. Extension of Rebuttal Expert Disclosures until March 15, 2021 (extended)
- 4. Extension of Expert Discovery Cut Off until March 31, 2021 (new)

1

¹ This case is set for trial beginning on June 1, 2021.

Wherefore, the Movants respectfully request that the Court extend the foregoing pre-trial deadlines.

Respectfully submitted,

Counsel for Plaintiff/Counter-Defendant Bret Bielema

By: /s/ Thomas A. Mars
Thomas A. Mars, AR Bar 86115
MARS LAW FIRM, P.A.
5500 Pinnacle Point Drive, Suite 202
Rogers, AR 72758
Phone: (479) 381-5535
tom@mars-law.com

Counsel for The Razorback Foundation, Inc.

By: /s/ Marshall S. Ney
Marshall S. Ney, AR91108
Robert W. George, AR98134
Katherine C. Campbell, AR2013241
Blake Z. Brizzolara, AR2017229
FRIDAY, ELDREDGE & CLARK, LLP
3350 S. Pinnacle Hills Parkway, Suite 301
Rogers, AR 72758
Office:(479) 695-6049
Facsimile:(501) 244-5389
mney@fridayfirm.com

Counsel for Counter-Defendant Neil Cornrich

/s/ Richard N. Watts
Richard N. Watts AR Bar 82174
Watts, Donovan, Tilley & Carson, P.A.
2120 Riverfront Dr., Suite 275
Little Rock, AR 72202
Phone: (501) 372-1406
richard.watts@wdtc.law